

Peter Goldstein [SBN 6992]
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Attorney for Plaintiffs
ROSA ESTER BRIZUELA, individually, and as
the Appointed Special Administrator of the
Estate of Rolando Antonio Brizuela, Roland Brizuela
and Morgan Brizuela

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA (RENO)

ROSA ESTER BRIZUELA, individually, and
as the appointed special administrator of the
estate of ROLANDO ANTONIO BRIZUELA;
ROLAND BRIZUELA; and MORGAN
BRIZUELA,

Plaintiffs,

v.

CITY OF SPARKS; ELI MAILE, sued in his
individual capacity as a Sparks Police Officer;
BRIAN SULLIVAN, sued in his individual
capacity as a Sparks Police Officer; and DOES
3-10; inclusive,

Defendants.

Case No. 3:19-cv-00692 -MMD WGC

**STIPULATION AND ORDER TO EXTEND
DATES FOR RESPONSE TO
DEFENDANTS' MOTION FOR SUMMARY
JUDGMENT**

(First Request)

IT IS HEREBY STIPULATED AND AGREED between Plaintiffs, ROSA ESTER BRIZUELA, individually, and as the appointed special administrator of the estate of ROLANDO ANTONIO BRIZUELA, ROLAND BRIZUELA and MORGAN BRIZUELA (collectively hereinafter "Plaintiffs"), and Defendants CITY OF SPARKS, ELI MAILE, and BRIAN SULLIVAN (collectively hereinafter "Defendants"), by and through their counsel of record, that Plaintiffs' deadline to respond to Defendants' pending motion for summary judgment (Dkt. 91) is extended up

1 to and including January 4, 2022, and Defendants shall not oppose Plaintiffs' request to exceed the
2 30-page limit, up to 53 pages for their response. (Plaintiffs shall not oppose Defendants' pending
3 request to exceed the 30-page limit, up to 53 pages for their pending motion for summary judgment;
4 provided that such non-opposition shall be conditioned upon Plaintiffs' receiving the above-
5 mentioned deadline extension and leave to file a 53-page response.)

6 This request for an extension is made in good faith and joined by all the parties in this case.
7 The request is timely pursuant to LR 26-3, well in advance of any current deadline. Accordingly,
8 this extension will not delay this case. Moreover, since this request is a joint request, neither party
9 will be prejudiced.

10 DATES this 23rd day of November, 2021.

11 CITY OF SPARKS

PETER GOLDSTEIN LAW CORP

12
13 By: /s/ Mariah Northington
14 Chester H. Adams
15 Wesley K. Duncan
16 Brandon C. Sendall
17 Barrack Potter
18 Mariah Northington
19 Attorneys for Defendants
20 *CITY OF SPARKS, ELI MAILE*
21 *and BRIAN SULLIVAN*

By: /s/ Peter Goldstein
Peter Goldstein
Attorneys for Plaintiff
ROSA ESTER BRIZUELA, individually, and
as the Appointed Special Administrator of
the Estate of Rolando Antonio Brizuela,
Roland Brizuela and Morgan Brizuela

18
19 IT IS SO ORDERED

20 DATED this 24th day of November, 2021.

21
22
23 
24 MIRANDA M. DU
25 CHIEF UNITED STATES DISTRICT JUDGE
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CERTIFICATE OF SERVICE

I am employed in the County of Clark, State of Nevada. I am over the age of eighteen years and not a party to the within action; my business address is 10161 Run Park Drive, Suite 150, Las Vegas, Nevada 89145.

I hereby certify that on this 23rd day of November, 2021, a true and correct copy of the following document **STIPULATION AND ORDER TO EXTEND TIME TO FILE RESPONSE TO SUMMARY JUDGMENT AND EXCEED PAGE LIMIT(First Request)** was served by electronically filing with the Court's CM/ECF electronic filing system to the following parties:

Chester H. Adams, Esq.
Sparks City Attorney
Wesley K. Duncan, Esq.
Chief Assistant City Attorney
Barrack Potter, Esq.
Sparks Senior Assistant City Attorney
Brandon C. Sendall, Esq.
Assistant City Attorney
Mariah Northington,
Sparks Assistant City Attorney
P.O. Box 857
Sparks, Nevada 89432-0857
Telephone: (775) 353-2324
Email: cadams@cityofsparks.us
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AttyCivilDiv@cityofsparks.us
bsendall@cityofsparks.us
bpotter@cityofsparks.us
mnorthington@cityofsparks.us
Attorneys for Defendants

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

By: 
An Employee of Peter Goldstein Law Corp

From: Northington, Mariah <mnorthington@cityofsparks.us>
Date: Tue, Nov 23, 2021 at 1:45 PM
Subject: RE: Motion to Exceed Page Limit
To: Jeremy Friedman <friedman313@gmail.com>, Potter, Barrack <bpotter@cityofsparks.us>
Cc: Duncan, Wes <wduncan@cityofsparks.us>, Peter Goldstein <peter@petergoldsteinlaw.com>, Adams, Chet <cadams@cityofsparks.us>

Mr. Friedman –

Please see the attached signed Stipulation. I made 2 changes – removing Mr. Brown from the signature block and from the Certificate of Service.

Thank you,

Mariah

Mariah Northington

Assistant City Attorney

Sparks City Attorney's Office

431 Prater Way

Sparks, NV 89431

(775) 353-2320

mnorthington@cityofsparks.us



From: Jeremy Friedman <friedman313@gmail.com>
Sent: Tuesday, November 23, 2021 1:20 PM
To: Northington, Mariah <mnorthington@cityofsparks.us>; Potter, Barrack <bpotter@cityofsparks.us>
Cc: Duncan, Wes <wduncan@cityofsparks.us>; Peter Goldstein <peter@petergoldsteinlaw.com>; Adams, Chet <cadams@cityofsparks.us>
Subject: Re: Motion to Exceed Page Limit

Counsel,

Thank you for your email. I'm appearing PHV and thus was unaware that the Local Rules had been revised in April 2020. Please see attached stipulation and let us know of any proposed revisions, or else and provide your authorization to file with the electronic signature of Defendants' attorneys.

Happy Thanksgiving,

Jeremy Friedman